



U.S. Department of Justice

Ronald C. Machen Jr.
United States Attorney

District of Columbia

Judiciary Center
555 Fourth St., N.W.
Washington, D.C. 20530

March 6, 2012

BY EMAIL

Gladys Weatherspoon, Esq.

Re: United States v. Curtis Patterson Case No. 2011 CF1 19417

Dear Counsel:

This letter is to extend a plea offer to your client, Curtis Patterson. This plea offer will remain open until March 8, 2012. However, the government reserves the right to revoke this plea offer at anytime before your client enters a guilty plea in this case. If your client accepts the government's plea offer, please notify me as soon as possible so that I can provide a proposed proffer of facts and additional paperwork to expedite the case's disposition. Upon receipt of the executed document, this letter will become the plea agreement between your client and the Office of the United States Attorney for the District of Columbia. The terms of the plea offer are as follows:

1. Your client, Curtis Patterson, agrees to admit guilt and enter a plea of guilty to the following offenses: one count of **Obstruction of Justice**, in violation of 22 D.C. Code, Section 722(a)(2)(A), and one count of **Unlawful Possession of a Firearm**, in violation of 22 D.C. Code, Section 4503(a)(1). Your client understands that Obstruction of Justice carries a potential penalty of up to 30 years in jail or a maximum \$10,000 fine, or both, and that Unlawful Possession of a Firearm carries a potential maximum penalty of 10 years in jail (and a mandatory minimum sentence of not less than one year in jail).

2. Your client understands that the Government will reserve stepback pending sentencing, will waive any sentencing enhancement papers that will apply, and will reserve allocation at sentencing, subject to the terms set forth in paragraph 5 of this agreement.

3. Your client understands that the Government agrees that it dismiss all remaining charges arising from the facts of this cases.



4. The parties further agree that your client, after taking an oath to tell the truth, shall agree to a factual proffer to be provided upon your acceptance of this agreement.

5. Your client understands that the Court may utilize the District of Columbia Sentencing Commission's Voluntary Sentencing Guidelines in imposing the sentence in this case. This plea offer is contingent upon an agreement between the Government and your client that neither party will seek an upward or downward departure outside of your client's applicable guideline range. Your client further understands that the applicable guideline range will not be determined by the Court until the time of sentencing.

6. Your client agrees that this letter is binding on the Government, but not binding on the Court, and that he cannot withdraw this plea at a later date because of the harshness of any sentence imposed by the Court.

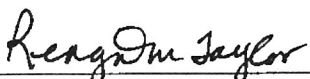
7. In entering this plea of guilty, your client understands and agrees to waive certain rights afforded to your client by the Constitution of the United States and/or by statute. In particular, your client knowingly and voluntarily waives or gives up his right against self-incrimination with respect to the offense(s) to which your client is pleading guilty before the Court which accepts your client's plea. Your client also understands that by pleading guilty your client is waiving or giving up your client's right to be tried by a jury or by a judge sitting without a jury, the right to be assisted by an attorney at trial and the right to confront and cross-examine witnesses.

8. This letter sets forth the entire understanding between the parties and constitutes the complete plea agreement between your client and the United States Attorney's Office for the District of Columbia. This agreement supersedes all prior understandings, promises, agreements, or conditions, if any, between this Office and your client.

Respectfully,

RONALD C. MACHEN JR.
UNITED STATES ATTORNEY

By:


Reagan M. Taylor
ASSISTANT U.S. ATTORNEY

**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
CRIMINAL DIVISION - FELONY BRANCH**

UNITED STATES OF AMERICA	:	Case No. 2011 CF1 19417
	:	
	:	
v.	:	Judge Thomas Motley
	:	
CURTIS PATTERSON	:	

FACTUAL PROFFER

Had this case gone to trial, the Government's evidence would have shown beyond a reasonable doubt that on or about 12:30 AM on October 2, 2010 the defendant, Curtis Patterson, also known as "Beezy," having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, had in his possession a firearm. The government's evidence would have further shown beyond a reasonable doubt that on April 27, 2011, upon being presented to a Grand Jury of the District of Columbia, the defendant testified untruthfully in an effort to obstruct the official investigation into the death of Angelo Jones ("the decedent").

On or about the evening of October 1, 2010 and into the early morning of October 2, 2010, the defendant was in a parking lot in the 5300 block of Dix Street NE, an area more commonly known as "Clay Terrace." The defendant had arrived in the area with his cousin and former co-defendant, Rickey Pharr, also known as "Packey." Also in the area with the defendant were Markeith Harvin, Anthony Baker, and Antwoine Baker, also known as "Country" or "Count." The defendant observed Pharr join a crap game, or dice game, that was happening in the parking lot and where the decedent was also playing craps. After joining the craps game, Pharr and the decedent began to argue and Pharr called the decedent "hot."

After the initial argument between Pharr and the decedent ended, the defendant and those involved with the craps game, including Pharr, moved to a grassy area located behind 5321 Dix Street NE in order to get out of the eyesight of nearby police officers. After the game moved, Pharr stepped away from the game and over to the defendant where Pharr told the defendant about his argument with the decedent and asked the defendant to give him a gun. In response, the defendant said that he would not give the gun to the defendant at that time. The defendant, Pharr and Antwoine Baker then walked away from the grassy area and the ongoing craps game. After walking away from the grassy area, the defendant received and possessed a gun, and passed that gun on to Rickey Pharr.

About five to ten minutes later, the defendant returned to the grassy area and Rickey Pharr followed shortly behind him indicating that he was armed with a gun. Shortly thereafter, Angelo Jones was shot to death on the Dix Street parking lot. Following the shooting, both the defendant and Pharr went to the 500 block of 50th Place NE, an area known as Lincoln Heights, where Pharr confessed to nearby witnesses that he'd shot the decedent after "Curtis" passed him a gun.



During the ensuing police investigation into the shooting death of Angelo Jones, the defendant was interviewed by the police and subpoenaed by the investigating Grand Jury. On April 27, 2011, the defendant was presented to a Grand Jury of the District of Columbia, escorted by his attorney. After taking an oath to testify truthfully before the grand jury, the defendant was asked the following questions and gave the following answers:

Q: Now, Mr. Patterson, before you left I had asked you while you were out there on that particular night, anyone had asked you to hand them a pistol. And you went to consult with your attorney, so I'll ask you again and what do you do?

A: No.

Q: Nobody asked you that?


A: No, sir.

The defendant, at the time of his testimony, knew and believed that his testimony was false in that he had, in fact, been asked by his cousin, Rickey Pharr to provide a firearm. The defendant made this statement to the grand jury in an effort to obstruct and impede the official investigation and the due administration of justice.

Respectfully submitted,

RONALD C. MACHEN JR.
United States Attorney

By:




REAGAN M. TAYLOR
Assistant United States Attorney
(202) 252-6819


DEFENDANT'S ACKNOWLEDGMENT

I have read and discussed the Government's Proffer of Facts with my attorney, Gladys Weatherspoon, Esq. I agree, and acknowledge by my signature that this Proffer of Facts is true and correct.

Date: 3/13/2012


Curtis Patterson
Defendant

Date: 3/13/2012


Gladys Weatherspoon, Esq.
Attorney For Defendant